

LAW OFFICES OF
AMBROSE WOTORSON
A PROFESSIONAL CORPORATION
SUITE 1811
26 COURT STREET
BROOKLYN, N.Y. 11242
TELEPHONE: 718 797-4861
FACSIMILE: 718 797-4863

March 28, 2011

VIA ECF

Honorable Roslynn R. Mauskopf, U.S.D.J.
United States District Court
Eastern District of New York
225 Cadman Plaza, East
Brooklyn, New York 11201

Re: Kathryn Blythe v. NYC Dept. of Education, et. al.
08 Civ. 2843 (RRM) (CLP)

Dear Honorable Judge Mauskopf:

This firm represents the plaintiff in the above-styled action.

We write, upon the consent of opposing counsel to request a two (2) week extension of time from March 29, 2011 until April 12, 2011, in which to respond to defendants' opposition to plaintiff's motion to amend the amended complaint, and defendants' motion for summary judgment dismissing for the amended complaint. This is plaintiff's first request for such an extension. Defendants have previously made a similar application which was granted by this Court. As well, we request a similar extension for defendants' reply papers until May 13, 2011.

This request is warranted as the undersigned has been unable to properly respond to defendants' papers as he has been in the midst of two trials in the matters of Rainbow Deli Market, Corp., et al. v. Aya Aldamin et al. Index No.: 506-2011, which is scheduled for a continuation on March 30, 2011 and City of New York, v. 2210 Church Avenue, et al., Index No.: 60015/2011, which is ongoing.

Although the undersigned has met with and discussed the motion with the plaintiff, it has been impossible to properly respond to the motion, given the undersigned's trial schedule. Accordingly we have spoken with opposing counsel, Donna Canfield, ACC and she consents to this request.

For these reasons, plaintiff respectfully requests that the summary judgment briefing schedule be adjusted as follows:

1. Plaintiff will serve her reply/opposition papers on or before April 12, 2011; and
2. Defendants will serve their reply papers on or before May 13, 2011;

Respectfully,

/s/

Ambrose W. Wotorson (AWW-2412)

cc: Donna Canfield, ACC